

Exhibit J

Douglas J. McCoy

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
DOUGLAS J. McCOY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

DOUGLAS J. McCOY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 53 Water Lane North, Levittown, New York 11756.
2. I am currently 43 years old, having been born on January 18, 1979.
3. I am the son of Stephen M. McCoy, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from bile duct cancer on January 25, 2019. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. My dad was my hero. I joined the air force and became a police officer because I wanted to follow in my dad's footsteps. My dad worked long hours to support our family, but he

always made time for me. My dad coached my little league team and took me and my family on vacations. I was able to have a good relationship with my relatives because my dad took us on trips to visit them. My dad was very supportive of me all throughout my life. I always felt like I could count on my dad if I needed anything.

6. My dad had a great relationship with my children. He loved spending time with them. My dad was always cheering for my kids during their athletic events. I was very appreciative of my dad for making my kids a priority in his life.

7. When I found out about the September 11th, 2001 attacks, I immediately called my parents to check up on them. I was relieved to find out that my dad was okay. After the attacks, my dad worked to clean debris at Ground Zero for six months. He was one of the most patriotic people I had ever known so it did not surprise me to see how much dedication he put into the helping with the search and recovery efforts at Ground Zero.

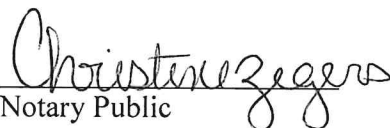
8. I was completely shocked when I found out that my dad had been diagnosed with cancer. My wife and I helped to take care of my dad when he went into hospice care. My wife even quit her job so she could spend more time with my dad. It was heartbreaking for me to see my dad suffering from the pain caused by his cancer. While he was in hospice care, my dad had become completely bedridden. He lost a lot of weight. He could hardly speak. I will never be able to forget those memories.

9. My life completely changed after my dad passed away. I became depressed. I felt it was unfair that my dad was never able to enjoy his retirement after working so hard to support our family. My children were devastated by the news of my dad's death. My oldest son no longer wants to celebrate his birthday because it marks the anniversary of my dad's death. The only

consolation I feel is knowing that my dad was proud of me for becoming a police officer. I know it will be a long and difficult road before I can come to terms with my dad's death.


DOUGLAS J. MCCOY

Sworn to before me this
26th day of May, 2022


Notary Public



Gail T. McCoy

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X
JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
GAIL T. McCOY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

GAIL T. McCOY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 14 Border Lane, Levittown, New York 11756.
2. I am currently 71 years old, having been born on July 5, 1950.
3. I am the wife of Stephen M. McCoy, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Stephen passed away from bile duct cancer on January 25, 2019. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Stephen was a wonderful husband and father. He was the love of my life. We spent all of our free time together. We went on cruises and took road trips to Long Island and

Florida. Stephen and I loved spending time with our family, especially our grandchildren. My life felt complete with Stephen by my side. We were both looking forward to spending our retirement together in our dream home in Pennsylvania.

6. Stephen was at work on the day of the September 11th, 2001 attacks. He was a Court Officer at the Criminal Court in Manhattan. Stephen went to Ground Zero to help with the rescue mission after he witnessed the World Trade Center crumble to the ground. Stephen was very patriotic, so it did not surprise me to see Stephen return home that night exhausted and covered in dust.

7. Almost every day for around six months, Stephen went to Ground Zero after work to continue helping with the rescue and recovery efforts. Stephen was a part of the bucket brigade. He hauled debris with many of the volunteers. He hardly ever talked to me about his experience at Ground Zero. He did mention to me that the face masks that had been given to him, and the volunteers were made of paper-like material. He was worried that the masks did not adequately protect him from the dust and toxins in the air.

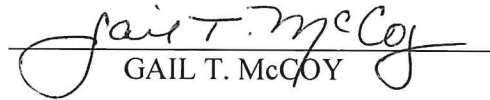
8. In 2016, Stephen was diagnosed with bile duct cancer. I could not believe the news and wanted a second opinion, so I took Stephen to see another doctor in Pennsylvania, who later confirmed Stephen's diagnosis. Stephen underwent chemotherapy and had surgery in June 2016. His cancer recurred in 2018. Stephen was at the hospital almost every week because he was always getting fevers and infections. I was in a constant state of fear and anxiety, not knowing what was going to happen to Stephen with each passing day.

9. Stephen's next surgery was cancelled because his cancer had spread throughout his entire body. Stephen's doctor told me that I should enjoy Christmas with Stephen because it would be his last. I was devastated. It was heartbreaking for me to tell Stephen that there was

nothing more his doctors could do to save him. I became very depressed knowing that Stephen would pass away soon.

10. Taking care of Stephen while he was in hospice care was physically and emotionally demanding. Stephen was bedridden and in a lot of physical pain. He stopped eating and drinking water. He was so weak that he could not stand on his own. Whenever Stephen fell out of his bed or wheelchair, I would get anxiety because I could not lift Stephen up by myself. One time, Stephen fell out of his wheelchair late one evening, and I had to ask our neighbors to help pick him up.

11. I never imagined that I would have to live the rest of my life without my wonderful husband. I do not think I can ever move on from Stephen's death. He was my everything.


GAIL T. McCOY

Sworn to before me this
25th day of May, 2022


Notary Public



John William McKee

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
JOHN WILLIAM MCKEE**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

JOHN WILLIAM MCKEE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 19 Alice Court, Lynbrook, New York, 11563.
2. I am currently 29 years old, having been born on December 25, 1992.
3. I am the son of John Patrick McKee, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father died from brain cancer on September 12, 2015 at the age of 48. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. My father and I had a very close-knit relationship. He always participated in all my sporting events, and, as I grew older, he would always come to watch as I played football, roller hockey and baseball. Dad would help me with school, go over homework, took me college tours, and helped me with college applications, including at Nassau, where I attended.

Later, dad and I worked together at the same university, City College in Harlem, before he became ill. As a CUNY police officer, my father worked in security and I worked in the bursar's office. This helped us become even closer, as we commuted to work together on a daily basis.

6. I first noticed that my father was becoming ill sometime around November, 2012, right after Hurricane Sandy hit. Around the same time, he lost use of his left arm, which was placed in a sling, and we suspected that he had a stroke. Upon further testing, the doctors determined that he had a tumor on his brain. The whole family rallied together because he needed so much support after losing the use of his arm.

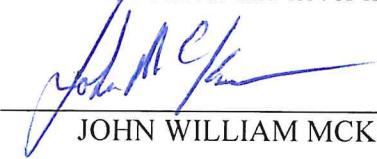
7. On September 11, 2001, my father was working at the CUNY campus downtown at the foot of the World Trade Center. He began relief work immediately, coordinating CUNY's response to the terrorist attacks and being the liaison for CUNY with the City for the duration of the operations at Ground Zero. My dad continued this work through November, 2001 and again in 2002 while working as a deputy director at the BMCC campus.

8. I was only 19 years old at the time of my dad's diagnosis. My entire life changed after my dad became sick. He had always done everything for us, and suddenly the roles were reversed, and my siblings and I had to take care of him. Facing the uncertainty of his future was frightening. As difficult as things were, my siblings and I all chipped in by taking my dad to physical therapy, running errands, and making meals for him on a regular basis.

9. My father helped my siblings and me with bills and expenses. I believe his intent was to continue to assist us financially while we attended college. However, because he became stricken with cancer while I was in college, I had to work to be more independent, assuming responsibilities for additional expenses, including auto insurance, cable and wireless bills.

10. My father was always a strong man who took pride in teaching me about sports. Watching him suffer with his illness was so extremely painful. As his cancer progressed, my dad had a seizure disorder, had difficulty remembering people's names, and never regained motor control in his left arm. I miss him very much. There is definitely a void in my life without

him. I wish he had never been exposed to the toxins and that the cancer had never happened.



JOHN WILLIAM MCKEE

Sworn to before me this
6th day of April, 2022



Notary Public

CONSTANCE CURRAN
Notary Public, State of New York
No. 01CU4684932
Qualified in Nassau County
Commission Expires Sept. 30, 2025

Laurence McKee

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

AFFIDAVIT OF AFFIANT
LAURENCE MCKEE

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

LAURENCE MCKEE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 28 Wellsboro Road, Valley Stream, New York 11580.

2. My current age is 92, having been born on January 7, 1930.

3. I am the father of John Patrick McKee, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My son passed away from glioblastoma on September 12, 2015, at the age of 48. It was medically determined that his illness was causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

5. John and I did all kinds of father and son things together. It's hard to pick out any one thing. We enjoyed life. As a family, we enjoyed good times. We did everything. We went up to the mountains, to all different ballgames. He played baseball as a kid. We went up to the mountains; took family vacations to a dude ranch, all the time. John loved it. We rode horses and drove tractors. John loved that stuff.

6. John was a deputy chief of police in New York City. He was a peace officer for the City University of New York ("CUNY"). He was proud of his work, loved it. That kind of work was always his passion. When he was a kid, we used to go to the shopping center, and he'd run around like he was trying to catch a thief. He built that department up from nothing. First, he got them bicycles, then they got cars. He went upstate to the state trooper's office, because he wanted his guys to have firearms. John took the classes, passed the tests, got all the qualifications and the department got guns. That was his pride and joy.

7. That's how he came to be in lower Manhattan on September 11, 2001. CUNY had a building down there. We knew he was down there, and we were watching it on the television. We saw how bad it was, and we wanted him to come home. I spoke to him two or three times that day. I said, "That's enough. It's time for you to come home now." There was dust everywhere, the firetrucks were covered, the people were covered, everything, we saw it all. But John wanted to stay there and help doing whatever he could. He did help. He rescued a woman. During that day, people called us to tell us they spotted John on the television. He was in the middle of all the commotion. There was a woman lying in the street. He picked her up and got her into a store. He got her to safety.

8. That was John. He made his mind up and nobody was going to change it. He stayed down there for three days, breathing in all of that stuff. He was there with a bunch of the other peace officers. Who knows if he had come home that first day if it would have made a difference? Hard to believe someone could cause all that destruction, to all those people, just by turning the wheels of an airplane in the other direction.


9. The aftermath was terrible. John got this cancer in his brain. It's very hard to lose your son like that. It was a very sad time. He couldn't walk. He couldn't move his hand. He couldn't do anything for himself. The doctors at the hospital told us he was lucky. If the operation had gone a hair wrong in either direction, he could have lost his speech and his eyesight, too.


10. Here he was, a young guy, in great shape with a big family—four kids. He had a new wife, a job that he loved. And it was all taken away from him. He spent three years in pain. At the end, I would visit my son every day. It was very hard to go over there, to see him like that. I used to feel sorry for him. He was in agony for three years, and then he was gone. It was

heartbreaking to see my son have to endure this terrible illness. His death is such a huge loss to my family and me.


LAURENCE MCKEE

Sworn to before me this
21st day of April, 2022


Notary Public


POONMATTIE SACKICHAND
NOTARY PUBLIC, STATE OF NEW YORK
NO. 12-1746085012
QUALIFIED IN QUEENS COUNTY
MY COMMISSION EXPIRES
DECEMBER 10, 2022

Ryan Patrick McKee

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
RYAN PATRICK MCKEE

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

RYAN PATRICK MCKEE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3530 Long Beach Road, Apt. 24, Oceanside, New York, 11572.

2. I am currently 22 years old, having been born on September 15, 1999.

3. I am the son of John Patrick McKee, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died of brain cancer on September 12, 2015. It was medically determined that this illness is causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was always there to try to get me interested in new things and worked to encourage me to find my strengths. I was always captivated by video games and remember on one occasion, there was a video game Olympics at the college and my dad took me to play as many arcades as possible. I was only 15 years old when my dad died and even younger when he

was diagnosed. This was a particularly difficult time because at the same time my father was diagnosed with brain cancer, I had a brain injury myself after suffering a concussion while playing football.

6. On September 11, 2001, my father was working at the CUNY campus downtown at the foot of the World Trade Center. He began relief work immediately, coordinating CUNY's response to the terrorist attack and being the liaison for CUNY with the City for the duration of the operations at Ground Zero. My dad continued this work through November, 2001 and resumed again in 2002 while working as a deputy director at the BMCC campus.

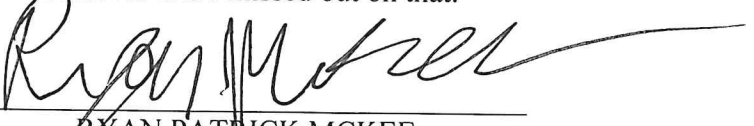
7. I learned about my dad's illness after observing him lose function in his arm. By the time I realized the gravity of the situation, it was already too late. My father's condition had progressed so much that I couldn't even adjust to it at that point.

8. Going through everything with my dad's cancer was especially difficult because at the same time I was going through junior high school and had just suffered a concussion. At school, I would basically stare out the window. I couldn't even pay attention because I was so distracted thinking about my dad. To make matters worse, I had become very interested in art, but sadly, my art teacher had cancer too and passed away just a few months before my dad. As a result of these additional layers of tragedy and sadness, I fell into a pattern of not caring about my education and was just floating my way through life. It was rough.

9. If my father were still around today, I would be a completely different person. I would have benefited tremendously from his guidance on how to identify my interests, be more responsible, and continue to grow. There was no time for him to teach me any of those things. I could have used his fatherly advice, and I lost the opportunity to learn from his wisdom. It's cruel that he was taken from me at such an early age.

10. There was such a strong support structure when my father was alive and well, which was totally destroyed after he died. After he passed away, I moved with my mother to the next town over but barely heard from anyone else. I felt as if I was going through everything alone. I lost so much more than just my father. I actually lost my family. I believe if my father

had lived, he would have held us all together. I will forever feel I missed out on that.



RYAN PATRICK MCKEE

Sworn to before me this
13th day of April, 2022



Notary Public

CONSTANCE CURRAN
Notary Public, State of New York
No. 01CU4684932
Qualified in Nassau County
Commission Expires Sept. 30, 2025

Samantha Rose McKee

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
SAMANTHA ROSE MCKEE

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF MASSACHUSETTS)
 : SS.:
COUNTY OF MIDDLESEX)

SAMANTHA ROSE MCKEE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 112 Webster Street, Apt. 2, Malden, Massachusetts 02148.

2. I am currently 20 years old, having been born on June 30, 2001.

3. I am the daughter of John Patrick McKee, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died from brain cancer on September 12, 2015. He was only 48 years old. It was determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was 15 years old when my father passed. My dad was always there for me and came to every cheerleading event and every softball game. He taught me everything he knew about baseball, our favorite pastime. We loved to sit and watch games together. My parents kept my brothers and me very active. I attended dance school where I learned ballet, tap, and theatre jazz. My dad never missed a dance recital.

6. My dad had a fun-loving side to him, and he wasn't shy about taking an interest in my brothers and me. When I was growing up, he would always take us to Nathan's in Oceanside, where we would play arcade games and even DDR (*Dance, Dance Revolution*). Sundays were also very special to us because we would attend church as a family and then have dinner together.

7. I was less than three months old at the time of the attacks on September 11, 2001. Nevertheless, in the years since I was told a great deal about my father's experience in the vicinity of the World Trade Center and his involvement in providing support to the 9/11 community and contributing to relief efforts as a CUNY officer. I've seen many photographs of dad taken at Ground Zero shortly after the attack evidencing his contribution to the relief efforts.

8. When I was around 10 or 11 years old, I learned about my dad's health conditions. Without anybody saying anything, I remember noticing at a Christmas dinner at church that when he was bringing tea to the table, his left arm gave way and he spilled some tea on me. He had already started losing control of his arm. A few weeks before telling me and my siblings about the cancer, I saw him with EKG monitors on his chest. While he didn't mention anything at the time, he talked about his diagnosis with me and my siblings as a group shortly thereafter. I saw him cry a number of times and grimace because of the pain in his arms. It wasn't before long that my dad was confined to a wheelchair. Before he was diagnosed with cancer, my parents had divorced and my brother Ryan and I lived with my mother. Even though we lived apart, my dad and I were very close, and I continued to try to help him as often as possible.

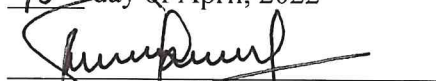
9. When my father was in his final stages of cancer, I was just starting high school and would cry a lot since I was filled with anxiety about my dad's health. Anytime I was sitting in class and heard the teacher's phone ring, I worried that it might be the front office calling to relay something bad about my dad. Not knowing how much longer my father had to live placed me and my family in a constant state of alert and fear for the worst.

10. The loss of my father at such a young age (he was only 48) had a huge financial impact on me and my family. I graduated high school early at 16 years old and then went on to cosmetology school. Currently, I am working as a hairstylist, but am also continuing in a further

cosmetology program and still have debt associated with my earlier cosmetology school. When my siblings and I were young, my dad worked to send all of us to private school and paid for the tuition. I'm sure that, if my dad had never been stricken with cancer, he would have continued to save and help us pay for college. More so than any financial impact, I miss my father and wish he were still here even if to share one more round of DDR or Sunday dinner.


SAMANTHA ROSE MCKEE

Sworn to before me this
13th day of April, 2022


Notary Public



Sandra McKee

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
SANDRA MCKEE**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF DUTCHESS)

SANDRA MCKEE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 70 Pye Lane, Wappingers Falls, New York 12590.

2. I am currently 57 years old, having been born on November 28, 1964.

3. I am the wife of John Patrick McKee, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from a glioblastoma on September 12, 2015. It was determined by the World Trade Center Health Program that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I met John in late December 2010. He was a single father at the time. We both lived in Lynbrook, Long Island, about 10 minutes apart. Our relationship progressed quickly. I met John's children, who lived at home with him, after about three months. We all hit it off, which helped our relationship progress smoothly. We did a lot of things together with John's children. It was never boring. John planned camping trips where we'd make s'mores, we'd go to the movies and sometimes ice-skating. He and I would spend weekends in Manhattan, just the

two of us, walking in the park or visiting museums. We loved spending alone time together, and it was always quality time. On weekdays, however, we would mostly stay home, and I would cook dinner for us and the kids. We were starting to build a nice little family.

6. When I met John, it had been almost a decade since the World Trade Center attacks. He took me to lower Manhattan to show me where the building he was working in on that day once stood. John was the director of public safety for the City University of New York (CUNY). He was like a police officer for the school, but his official title was Peace Officer. John was working at Borough of Manhattan Community College (BMCC) on 9/11. That building collapsed a few days after the attacks. It was John's job to manage the university's response. He remained in the area in another BMCC building for three days.

7. John proposed to me on my birthday in November 2012. Less than a month after our engagement, everything changed. I remember exactly when it started. John, the kids and I went to a school Christmas show that John's daughter was performing in. He was bringing me a cup of coffee and suddenly dropped it. He said he couldn't move his hand. I later took John to the Emergency Room to get his hand checked out. At first, they suspected a stroke, but an MRI revealed that he had a golf-ball sized tumor in his brain. He was diagnosed with Stage IV brain cancer, more specifically, a glioblastoma multiforme. Looking back, I realize that there were symptoms before he was diagnosed. I noticed his hands often tremored. He also would forget things that happened the day before. At times, he would even confuse me with his ex-wife. It was all due to the cancer.

8. On January 7, 2013, John had a craniotomy. The surgery took over 18 hours. The wait was excruciating. I never left the hospital. He came through the surgery well, and initially, seemed to improve after the surgery. We were hopeful that we would finally be able to start our lives together. Unfortunately, once John started receiving radiation treatments, that hope of a normal life quickly faded. The treatments were literally frying his brain. After each treatment, he was zombie-like for days. It was awful to see.

9. I moved into John's house after the craniotomy. I was taking care of him, his kids, plus I had a full-time job. It was really hard. I was exhausted. It was extremely difficult taking care of John after the craniotomy. I basically had to do everything for him. At one point I became so overwhelmed that I actually left him. I loved him, but it all became too much. Once I

left, I never thought I would go back. I was away for two nights when I got a frantic call from John's son saying that his father was bleeding and that there was blood everywhere. He was panicked and pleaded with me to come to the house. When I arrived, John had a bad nosebleed. I immediately took him to the doctor. I felt truly guilty for leaving him alone, even though it was only for a couple of nights. I never left him again and stayed with him until the day he died.

10. Watching him deteriorate physically was horrible for me. The man I met was strong and vibrant. It was one of the things that attracted me to him. The man he became couldn't even tie his own shoes. I felt helpless because I couldn't help him in any meaningful way. I did whatever I could do. I drove him everywhere he had to go, including to his doctor appointments, and I was happy to do it. I wanted to do so much more for him. I wish I could have healed him. About a month into treatment, John fell getting out of the car and broke his leg. His bones became brittle because of the treatment. He was a big guy, and I had to physically lift him up to get him in the car. Still, it got worse. After he broke his leg, the doctors told me he had pneumonia and he had to go on a ventilator. That was an absolute nightmare. We weren't even married yet. John spent four or five months on the ventilator. We actually got married on July 30, 2013, while he was still on the ventilator. He remained on the ventilator until September 2013.

11. After he was taken off the ventilator and completed rehab, John moved back home, where he stayed until he died. Taking care of him became increasingly challenging for me, both physically and mentally. I felt like I was all alone and losing my mind. I would go outside and yell and punch the outside of the house. I tried not to lose it in front of John. He could barely talk, and, at that point, he couldn't walk. I had to bathe him and dress him. He was totally dependent on me. I had to get special equipment in the house for him. He was confined to a wheelchair, so we needed to have ramps installed. And even though he had lost so much weight, lifting him was really difficult. We had a pulley system, almost like a clothesline for outside. It wasn't easy, though. I dropped him a bunch of times, which would always make me cringe, especially when there was snow or ice. One time he fell and broke his ribs. I felt so inadequate, like nothing I did helped him.

12. In the midst of all of this, I was still working full-time as a purchaser for Jamaica Hospital in Queens and commuting to John's house in Lynbrook each day. I still had my

apartment nearby, where my kids were living. At some point, I moved John to the nursing home at Jamaica Hospital so I could be near him while I was at work. After work, I'd go back to my apartment, feed my kids, and help them with homework. Then, I'd go back to Jamaica Hospital and stay with John until he fell asleep. My kids were older, so I could leave them alone overnight. I'd wake up the next morning and go back home to get the kids off to school. That became my daily routine. It was exhausting.

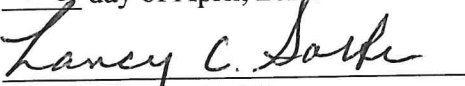
13. Ultimately, John's kids moved in with their mother. John's illness took its toll on my relationship with his kids as well. I never told John any of it. He was dealing with enough and didn't need to know any of it.

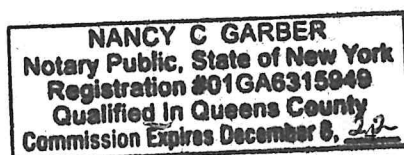
14. In the spring or summer, 2015, John asked my son, daughter-in-law and granddaughter to move in with us. He told my son that he didn't want me to be alone when he died. With John being sick, we were struggling financially and missed some payments on the house. It is not cheap to live on Long Island. If John could have returned to work, we would have been fine with our combined incomes. Unfortunately, that was not the case, and we had to get by on my salary and whatever John collected from Social Security.

15. When John got sick, it changed my life drastically. It was so unfair that we never even had a chance to have a normal, healthy life together. He should still be here. When he died, I couldn't stay in that house. I started drinking excessively. I was basically a functioning alcoholic. I've gotten better, but I'm still in therapy from all the stress. I never got over it. I wouldn't want to go through what John did and wouldn't want anybody going through what I did taking care of him.


SANDRA MCKEE

Sworn to before me this
20 day of April, 2022


Nancy C. Garber
Notary Public



Shawn Mckee

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
SHAWN MCKEE**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

SHAWN MCKEE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 11 Prospect Avenue, East Rockaway, New York, 11518.

2. I am currently 25 years old, having been born on June 26, 1996.

3. I am the son of John Patrick McKee, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On September 12, 2015, my father passed away from glioblastoma at the age of 48. It was determined by the World Trade Center Health Program that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father coached all of my baseball teams and taught me how to play football. He got me into baseball, and, as a result I became a big Mets fan. We would always go to the subway series with my siblings as well as my dad's friends from work. Attending the ballgames was some of the best bonding time with dad.

6. I was around fifteen years old when I first learned of my dad's diagnosis. I learned about the seriousness of my dad's condition after my father and his wife, Sandra, sat

down my siblings and me and told us all together. However, in addition, I could see that my father had lost dexterity in his fingers. My dad also fell, which led people to believe he had a stroke. Unfortunately, this led to additional testing, which revealed that he actually had brain cancer.

7. After I learned that my dad had cancer, it was a deeply troubling experience. I can remember speaking to my friends about my father's condition. It was surreal to even hear myself speak the truth about my dad's declining health. It was so hard to have to grow up overnight. Honestly, we all had to grow up pretty quickly to help my dad out with certain things that he would ordinarily do for us. I recall one time when I broke my hand and we went to the hospital together. I was having my bone set, and at the same time my father was getting additional radiology films for his cancer.

8. My dad supported his whole family as my siblings and I grew up. We all went to private Catholic school, which he paid for as well. He also paid for the best sports equipment and never forgot about Christmas and birthday gifts. As my father's health condition declined, he wasn't able to continue the same level of support. Instead, my family and I all had to come together to provide as much support to my dad as possible.

9. Dad was 100% the glue that kept the family together because right when he got sick, and then after he died, we all split up and lived on our own. We don't always get together for Sunday dinners, holidays, and birthdays anymore, and things are not the same as they used to be when dad was around. It tore our family apart, and I'm saddened that was taken away from us, since the togetherness that dad helped bring was a big part of our lives.



SHAWN MCKEE

Sworn to before me this
6 day of April, 2022


Notary Public

Eric Wexler
Notary Public, State of New York
No. 01WE6399987
Qualified in Nassau County
Commission Expires November 4, 2023

Margaret Mary Janet Tosca

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF MARGARET
MARY JANET TOSCA**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

MARGARET MARY JANET TOSCA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 28 Wellsboro Road, Valley Stream, New York 11580.

2. I am currently 59 years old, having been born on June 8, 1962.

3. I am the sister of John Patrick McKee, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from glioblastoma on September 12, 2015, at the age of 48. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. John was my younger brother and the baby of the family. We were always very close. Even though I was the older sister, John liked to act like he was the boss. I used to do everything with John. He was my right hip. We loved the Islanders and would go to games together. When we got older, our families would vacation together. John and I only lived about 10 minutes from each other, and we spoke every day by phone. John was always there for me.

Even if I called him at 3:00 a.m., he would answer his phone. Our bond grew deeper when our dad's health began to decline, and John and I shared the responsibility of taking care of him. I don't have that anymore. It's hard to take care of my dad on my own. He's 92, with some medical issues, but he talks about John all the time. Sometimes I need to block it out. I really miss John. It was the biggest loss in the world for me. I always thought my baby brother would bury me. Now I go to his grave, and I vent at him for leaving me alone.

6. On September 11, 2001, my brother worked for BMCC/CUNY as a Peace Officer. The building was very close to the World Trade Center. The whole family knew he was down there. We kept reaching out to him, begging him to please come home, but he wanted to stay and help. He was there for the first three days and then spent several weeks returning to the site to help with the clean-up. From the day it happened until the day he died, John had terrible nightmares about the things he had witnessed during the clean-up efforts. I made John tell me what he saw. He didn't want to, but I kept prying. The things he told me haunt me. I can't imagine seeing it first-hand. He told about a pregnant woman's body he had seen and the baby was literally outside of her stomach. It's no wonder he had nightmares.

7. When John began suffering with headaches, he wasn't one to go to the doctor. We started to notice some difficulties he was having with simple things. For example, I remember exactly when I knew that he was seriously ill. He was at his daughter's school concert and he dropped a cup of coffee. It seemed as though his arm and hand didn't work. I can't recall which side, but he couldn't hold onto anything. That's when he decided to go to the doctor. Sadly, he was diagnosed with brain cancer. After his diagnosis, he deteriorated quickly.

8. John underwent brain surgery. After the surgery, I went to the hospital every day for 2-1/2 months to feed him lunch. He couldn't eat. He couldn't talk. It took a huge toll on me seeing this once strong, healthy guy, not be able to do anything for himself. The hardest day was when I was in John's room with his doctor, and the doctor asked him if he knew who I was. John looked straight at me but couldn't say my name. I was crushed. After leaving the hospital, I sat in my car in the hospital parking lot for two solid hours and cried. I didn't even have the strength to

go home. I couldn't believe this was happening to my baby brother.


9. Since John passed away, I think about him every day. I keep wishing I could reset the clock and turn back time so John could still be with us, even though I knew that's not possible.


MARGARET MARY JANET TOSCA

Sworn to before me this
21st day of April, 2022



Notary Public


POONMATTIE SACKICHAND
NOTARY PUBLIC, STATE OF NEW YORK
NO. 12-01716085012
QUALIFIED IN QUEENS COUNTY
MY COMMISSION EXPIRES
DECEMBER 13, 2022

Anne McQuade

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X

JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
ANNE McQUADE**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF FLORIDA)
 : SS.:
COUNTY OF PASCO)

ANNE McQUADE, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 7326 Baltusrol Drive, Newport Richie, FL 34654.

2. I am currently 58 years old, having been born on June 27, 1963.

3. I am the wife of Kevin Patrick McQuade, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from esophageal cancer on August 25, 2011, at the age of 56. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Kevin and I had a very good relationship. We truly enjoyed spending time together, whether it was playing darts, going out with friends to dinner and parties, or simply

supporting our two sons by going to their baseball and football games. We loved to do family things together as well, especially travel and go on cruises.

6. Within days of 9/11, Kevin was working on the Staten Island Ferry and heading into Manhattan to take water and supplies to first responders. For years after 9/11, until approximately 2009, my husband continued working on the ferry, breathing in the toxic dust every day. He was provided with only a paper-thin mask for protection. Kevin was a deck hand, responsible for cleaning up the ferry, tying up the boat up to the dock, and checking on passengers.

7. Following 9/11, Kevin started complaining that he had trouble swallowing. He had difficulty eating because he said it felt like food was “stuck” in his chest. He was very uncomfortable and started losing a lot of weight. He could barely finish his meals. After he went to the doctor and they ran a few tests, Kevin was diagnosed with Stage IV esophageal cancer. I was completely shocked. I never expected anything like that would ever happen to my husband. I watched him go through strong and painful chemotherapy. I saw him work long hours, often double shifts, despite being in so much pain and having to vomit at work. He was so committed to providing for our family that he was willing to tough it through the pain and suffer in silence.

8. In February 2009, Kevin had an esophagectomy to remove and reattach his esophagus. After the surgery, he developed a severe infection and had to have surgery again. He stayed in the hospital for two weeks. After that, Kevin required round-the-clock care for months. I would wake up at night when the alarms on Kevin’s machine would go off and frantically call his nurse. It was hard for me to watch Kevin in so much pain and be unable to do even simple things like sitting up by himself and going up and down stairs. He became so weak that he was ultimately forced to retire from his job.

9. I had trouble concentrating at work since I had a demanding job as a nursing assistant at Staten Island Hospital. I had to watch our two sons and try to explain to them what their father was going through with his terminal cancer. I struggled to deal with our children. I had to take time off work so I could be at Kevin's chemotherapy and doctor appointments. My entire life became about taking care of my husband and sons.

10. I struggled with the financial impact of Kevin's cancer, too. Despite being an incredibly hard worker and working through his chemotherapy, Kevin ultimately had to stop working. We could no longer keep afloat with our bills. We could not pay our mortgage, our sons' school tuitions, and insurance. We ended up losing our home and going into foreclosure. It was devastating to lose our home and have to uproot our life to move to Florida. Our sons were pulled out of school and had to leave their friends. I felt terrible for them.

11. In July 2011, shortly after our family moved to Florida, Kevin's cancer came back and had metastasized to his spine and bronchial tube and chest. He developed a fistula in the esophagus/bronchial area. He underwent a few rounds of radiation of the spine to try to treat his excruciating pain, but ultimately the doctors concluded there was nothing they could do. The doctors told me to take him home and enjoy whatever time we had left with Kevin.

12. It broke my heart to see Kevin suffer and want nothing but to be close to me. I had to move all our beds downstairs so we could be together since he could no longer do stairs. I had to care for Kevin around the clock, including taking him to the bathroom. Toward the end, I had to make the tough decision to send him to hospice and receive more hands-on care. He didn't want to go to hospice. He was afraid to leave us. He knew he wouldn't be coming home. That was so hard on all of us.

13. My entire life changed watching Kevin go through what he did. He didn't deserve any of it. We didn't deserve any of it. It pretty much cost us everything. I am haunted every day by 9/11 and the ultimate price my family paid because of it.

Anne McQuade
ANNE McQUADE

Sworn to before me this
2nd day of May, 2022

Charlene Galla
Notary Public
Charlene Galla



Charlene D. Galla
State of Florida
My Commission Expires 02/16/2024
Commission No. GG 958637